REMARKS

The Amendment is fully responsive to the final Office Action dated November 25, 2008, issued in connection with the above-identified application. Claims 1-17 are all the claims pending in the present application. With this Amendment, claims 1, 12 and 16 have been amended. No new matter has been introduced by the amendments made to the claims. Thus, favorable reconsideration is respectfully requested.

In the Office Action, claims 1-11, 16 and 17 have been rejected under 35 U.S.C. 101 for being allegedly directed to non-statutory subject matter. With regard to claims 1-11 the Examiner indicates that claims 1-11 do not positively recite statutory subject matter because the claim limitations are interpreted as software *per se*. The Applicants respectfully disagree that claims 1-11 are software *per se* for at least the reasons noted below.

Claim 1 is directed to a display process device that includes an information storage section, a screen definition information interpretation section, a first event conversion section, and a device resource control section. As clearly seen in Fig. 2, features noted above in claim 1 are implemented as hardware devices. This point is fully supported in various portions of the Applicants disclosure.

For example, page 11 of the Applicants' disclosure states that "the display process device 10 may be realized in a form of hardware"; page 12 of the Applicants' disclosure states that the information storage section 11 "is an internal storage device of RAM, ROM, or the like"; page 13 of the Applicants' disclosure states that the screen definition information interpretation section 12 may be "a player for reproducing a two-dimensional content, a player for reproducing a three-dimensional content such as a Flash player, or a player for reproducing a content described in XML"; page 20 of the Applicants' disclosure states that the screen definition interpretation section 12 may also be implemented as a Flash player or VRML player; and page 17 through 18 suggest that both the first event conversion section and the device resource control section can be implemented as processors or controllers performing the features recited in the claims.

Based on the above discussion, independent claim 1 is directed to a device having ample

structure to fall within one of the four enumerated statutory classes of patentable subject matter. Accordingly, withdrawal of the rejection to claims 1-11 under 35 U.S.C. 101 is respectfully requested.

With regard to claims 16 and 17, the Examiner indicates that claims 16 and 17 are still directed to software *per se*. However, the Applicant have further amended independent claim 16 to more particularly point out that the computer-readable program is stored in a computer-readable <u>storage</u> medium for causing a display process device to execute display process steps for displaying a screen. It is well established that programs impart functionality when stored or employed as a computer component. Additionally, software (i.e., functional descriptive material) recorded on a computer-readable medium becomes structurally and functionally interrelated to the medium and will be statutory in most cases (see MPEP 2106.01).

Thus, as amended, claim 16 now recites a program stored on a computer-readable storage medium and as such defines a structural and functional interrelationship between the program and hardware components which permit the functionality of the program to be fully realized. Therefore, claim 16 (as amended) is believed to be statutory. Withdrawal of the rejection to claims 16 and 17 under 35 U.S.C. 101 is respectfully requested.

In the Office Action, claims 1-17 have been rejected under 35 U.S.C. 102(b) as being anticipated by Roberts (U.S. Patent No. 5,801,696). The Applicants have amended independent claims 1, 12 and 16 to help further distinguish the present invention from the cited prior art. Claim 1, as amended, recites the following features:

"[a] display process device operable to execute a program stored on a computer-readable medium that causes the display processing device to display a screen on a display, comprising:

<u>an information storage section storing screen definition information defining a correlation among a screen displayed on the display, an action corresponding to an instruction indicated in the screen, and an access instruction for having an access to a resource on the apparatus in which an application is operable;</u>

a screen definition information interpretation section interpreting the screen definition information, generating a screen which is to be displayed on the display, and, in accordance with

an instruction given thereto, issuing a first screen event for the action corresponding to the instruction;

a first event conversion section converting the first screen event to a first device event, which may be interpreted and executed by a device resource retained by the display process device; and

a device resource control section controlling the device resource based on the first device event converted in said first event conversion section."

The features emphasized above in independent claim 1 are similarly recited in independent claims 12 and 16. Additionally, the features emphasized above are fully supported by the Applicants' disclosure (see e.g., ¶ [0021]).

In Office Action, the Examiner indicates that, in the previous response, the Applicants argued that certain features of the present invention were distinguishable over Roberts. However, the Examiner also indicates that some of the features of the present invention relied on and argued by the Applicants were not specifically recited in the claims.

In particular, the Examiner indicates that the Applicants argued that "an advantage of the present invention is that it provides a description of information, or the like (e.g., for starting another application which is operable in an apparatus) for using a function retained by another application, or for modifying a display of a key guidance letting a user (i.e., who is operating the apparatus) know about a next action. In addition, the Examiner admits that this feature is not disclosed or suggested in Roberts, and suggests that the Applicants amend the independent claims in incorporate the features noted above (see Office Action, pg. 10).

Accordingly, the Applicants have amended independent claims 1, 12 and 16 to clarify the distinguishable features between the present invention and the cited prior art (i.e., noted by the Examiner).

In particular, claim 1 (as amended) recites that an information storage section stores screen definition information defining a correlation among a screen displayed on the display, an action corresponding to an instruction indicated in the screen, and an access instruction for having an access to a resource on the apparatus in which an application is operable.

Thus, the present invention (as recited in independent claims 1, 12 and 16, as amended) is clearly distinguishable over Robert in that the present invention provides a description of information, or the like (e.g., for starting another application which is operable in an apparatus) for using a function retained by another application, or for modifying a display of a key guidance letting a user (i.e., who is operating the apparatus) know about a next action. No such features or advantages are believed to be disclosed or suggested by Roberts.

Based on the above discussion, independent claims 1, 12 and 16 (as amended) cannot be anticipated or rendered obvious by Roberts. Additionally, claims 2-11, 13-15 and 17 cannot be anticipated or rendered obvious by Roberts at least by virtue of their respective dependencies from independent claims 1, 12 and 16.

In light of the above, the Applicants respectfully submit that all the pending claims are patentable over the prior art of record. The Applicants respectfully request that the Examiner withdraw the rejections presented in the outstanding Office Action, and pass the application to issue. The Examiner is invited to contact the undersigned attorney by telephone to resolve any remaining issues.

Respectfully submitted,

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10